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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ROMIE LEMON TURNER,
15 Defendant.

Case No. 2:16-cr-073-JCM-CWH

**STIPULATION TO CONTINUE
MOTION DEADLINES**
(Third Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
18 United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Brenda Weksler,
20 Assistant Federal Public Defender, counsel for Romie Lemon Turner, that the pretrial motions
21 deadline be vacated and continued for thirty (30) days.

22 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
23 shall have to and including September 1, 2016, to file any and all responsive pleadings.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
25 shall have to and including September 8, 2016, to file any and all replies to dispositive motions.

26 The Stipulation is entered into for the following reasons:

- 27 1. The client is in custody and does not oppose the continuance.

1 2. The additional time requested herein is not sought for purposes of delay, but merely
2 to allow counsel for the defendant sufficient time to complete necessary research, prepare and
3 submit appropriate pretrial motions.

4 3. Undersigned defense counsel needs additional time to obtain documentation
5 pertinent to the case.

6 4. Denial of this request for continuance would deny counsel for the defendant
7 sufficient time to effectively and thoroughly prepare and submit pretrial motions and notices of
8 defense, taking into account the exercise of due diligence.

9 5. This is the third stipulation to continue filed herein.

10 DATED this 18th day of July, 2016.

11
12 RENE L. VALLADARES
13 Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

14 /s/ Brenda Weksler
15 By _____
16 BRENDA WEKSLER
Assistant Federal Public Defender

/s/ Phillip N. Smith, Jr.
By _____
PHILLIP N. SMITH, JR.
Assistant United States Attorney

UNITED STATES OF AMERICA,
Plaintiff,
v.
ROMIE LEMON TURNER,
Defendant.

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

- 3

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interest of the public since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

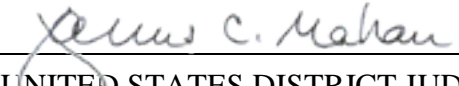
ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including August 18, 2016, to file any and all pretrial motions and notices of defense.

IT IS FURTHER ORDERED that the parties shall have to and including September 1, 2016 to file any all responses.

IT IS FURTHER ORDERED that the parties shall have to and including September 8, 2016 to file any and all replies.

DATED July 21, 2016.


UNITED STATES DISTRICT JUDGE